

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

T. ROWE PRICE GROWTH STOCK FUND,  
INC., et al.,

Plaintiffs,

v.

VALEANT PHARMACEUTICALS  
INTERNATIONAL, INC., et al.,

Defendants.

Civil Action No. 16 CV 5034 (MAS)(LHG)

EQUITY TRUSTEES LIMITED AS  
RESPONSIBLE ENTITY FOR T. ROWE  
PRICE GLOBAL EQUITY FUND, et al.,

Plaintiffs,

v.

VALEANT PHARMACEUTICALS  
INTERNATIONAL, INC., et al.,

Defendants.

Civil Action No. 16 CV 6127 (MAS)(LHG)

PRINCIPAL FUNDS, INC., et al.,

Plaintiffs,

v.

VALEANT PHARMACEUTICALS  
INTERNATIONAL, INC., et al.,

Defendants.

Civil Action No. 16 CV 6128 (MAS)(LHG)

BLOOMBERGSEN PARTNERS FUND LP,  
et al.,

Plaintiffs,

v.

VALEANT PHARMACEUTICALS  
INTERNATIONAL, INC., et al.,

Defendants.

Civil Action No. 16 CV 7212 (MAS)(LHG)

NOTICE OF PARTIAL MOTION TO  
DISMISS PLAINTIFFS' COMPLAINTS

(ORAL ARGUMENT REQUESTED)

Motion Date: September 5, 2017

PLEASE TAKE NOTICE that on September 5, 2017, defendant J. Michael Pearson ("Pearson") will and hereby does move pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure before the Honorable Michael A. Shipp, United States District Judge for the District of New Jersey, at the Clarkson S. Fisher Building and U.S. Courthouse, 402 East State Street, Trenton, New Jersey 08608, for an order (i) limiting the scope of Counts I and III in each of the above-captioned actions to exclude Plaintiffs' purchases of Valeant Pharmaceuticals International, Inc. ("Valeant") securities that occurred after October 2015, and (ii) dismissing Count II in Plaintiffs' complaints in each of the above-captioned actions. Pursuant to Local Civil Rules 7.1(b)(4) and 78.1(b), Pearson respectfully requests that the Court grant oral argument on this motion.

In support of this motion, Pearson relies upon the memorandum of law submitted by Valeant in support of its partial motion to dismiss the Plaintiffs' complaints and all further filings and proceedings had in these actions. For this reason, Pearson need not submit his own memorandum of law in support of this motion.

Dated: June 16, 2017      DEBEVOISE & PLIMPTON LLP

By:                                /s/ Holly S. Wintermute

Holly S. Wintermute  
Bruce E. Yannett (motion for *pro hac vice* admission pending)  
DEBEVOISE & PLIMPTON LLP  
919 Third Avenue  
New York, New York 10022  
Telephone: (212) 909-6000  
Facsimile: (212) 909-6836

Jonathan R. Tuttle (motion for *pro hac vice* admission pending)  
Ada Fernandez Johnson (motion for *pro hac vice* admission pending)  
Anna Moody (motion for *pro hac vice* admission pending)  
DEBEVOISE & PLIMPTON LLP  
801 Pennsylvania Avenue, N.W.  
Washington, D.C. 20004  
Telephone: (202) 383-8000  
Facsimile: (202) 383-8118

*Attorneys for J. Michael Pearson*